

**BEFORE THE
ILLINOIS COMMERCE COMMISSION**

In the Matter of)	
LEVEL 3 COMMUNICATIONS, LLC)	
Petition For Arbitration Pursuant to Section 252(b))	Docket No. 00-0332
of the Federal Telecommunications Act of 1996,)	
to Establish an Interconnection Agreement with)	
Illinois Bell Telephone Company d/b/a)	
Ameritech Illinois)	

JOINT UNRESOLVED ISSUES LIST

Michael R. Romano
Attorney
Level 3 Communications, LLC
1025 Eldorado Boulevard
Broomfield, Colorado 80021
720/888-7015 (Tel.)
720/888-5134 (Fax)
e-mail: mike.romano@level3.com

and

Rogelio E. Pena
State Bar No. 15740700
Nichols & Pena, LLP
2060 Broadway, Suite 200
Boulder, Colorado 80302
303/442-4300 (Tel.)
303/443-6764 (Fax)

Russell M. Blau
Tamar E. Finn
Edward W. Kirsch
Zenas Choi
Swidler Berlin Shereff Friedman, LLP
3000 K Street, NW, Suite 300
Washington, DC 20007
202/424-7877 (Tel.)
202/424-7645 (Fax)
e-mail: ewkirsch@swidlaw.com

Dated: July 12, 2000

Level 3 Communications, LLC (“Level 3”) and Illinois Bell Telephone Company d/b/a Ameritech Illinois (“Ameritech”) hereby file with the Commission their Joint Unresolved Issues List (Exhibit A) in Docket No. 00-0332. As Level 3 understands it, Ameritech and Level 3 intend to offer this as a joint exhibit at the hearing.

Respectfully submitted,

Level 3 Communications, LLC

By

Russell M. Blau
Edward W. Kirsch
Swidler Berlin Shereff Friedman, LLP
3000 K Street, N.W., Suite 300
Washington, D.C. 20007
202/424-7877 (Tel.)
202/424-7645 (Fax)
e-mail: ewkirsch@swidlaw.com

and

Michael R. Romano
Attorney
Level 3 Communications, LLC
1025 Eldorado Boulevard
Broomfield, Colorado 80021
720/888-7015 (Tel.)
720/888-5134 (Fax)
e-mail: mike.romano@level3.com

Its Attorneys

Dated: July, 12, 2000

EXHIBIT A

**Level 3 and Ameritech
JOINT UNRESOLVED ISSUES LIST – ILLINOIS
Docket No. 00-0332**

<i>Issue</i>	<i>Appendix/ Section</i>	<i>Status of Issue</i>
Reciprocal Compensation: Definition of “Local Calls” And Reciprocal Compensation (ISSUE 1a)	General Terms & Conditions (GT&C) 1.1.74, New 1.1.67; Appendix (App.) ITR 1.5, 5.2.4, 5.6.3; App. Reciprocal Compensation (Recip. Comp.) 2.1, 2.2, 2.3, 2.4, 2.5, 2.6, 2.9	Unresolved.
Reciprocal Compensation: Eligibility for Tandem Compensation (ISSUE 1b)	GT&C 1.1.29.2	Unresolved.
Deployment of NXX Codes (ISSUE 2)	GT&C 1.2.8, 1.1.52, 1.1.55, 1.1.98; App. ITR 5.4.6; App. Recip. Comp. 2.2, 2.6, 2.7; all of Apps. FX & FGA	Unresolved.
Relationship of Agreement and Tariffs (ISSUE 3)	GT&C 2.5.1, 2.6.3	<i>The parties have resolved this issue.</i>
Severability and MFN (ISSUE 4)	GT&C 2.8.1, 43.1, 49.1	<i>The parties have resolved this issue.</i>
Charges for CLEC Name Changes (ISSUE 5)	GT&C 4.9, 4.10, 29.2	Unresolved.
Term of the Agreement (ISSUE 6)	GT&C 5.2	Unresolved.
Deposits, Billing, and Payments (ISSUE 7)	GT&C all of Section 7, 8.2, New 8.3, 8.4, 8.4.4.5.2, 8.4.4.5.3, 8.5, 8.8, 9.1, 9.2, 9.2.1, New 9.2.2, 9.3, 9.3.1, 9.3.3, 9.3.4, all of 9.5, 9.6.1, 9.6.1.1, 9.6.1.2, 9.6.2, 9.6.3, 9.6.3.1, all of 9.6.8	Unresolved.
Dispute Resolution (ISSUE 8)	GT&C 10, 10.12.3, 10.12.4, 10.13.2, 10.13.3	<i>The parties have resolved this issue.</i>
Limitation of Liability (ISSUE 9)	GT&C 1.1.78, 13.1	<i>The parties have resolved this issue.</i>

**Level 3 and Ameritech
JOINT UNRESOLVED ISSUES LIST – ILLINOIS
Docket No. 00-0332**

Third Party Intellectual Property Rights (ISSUE 10)	GT&C 14.5, 14.5.1, 14.5.2, 14.5.3, 14.6, 16.1, 16.1.1, 16.1.2, 16.1.3, 16.2, 16.2.1	Unresolved.
Disclosure of Proprietary Information (ISSUE 11)	GT&C 20.5	<i>The parties have resolved this issue.</i>
Intervening Law (ISSUE 12)	GT&C 21.1	<i>The parties have resolved this issue.</i>
Governing Law (ISSUE 13)	GT&C 22.1	<i>The parties have resolved this issue.</i>
Assignment (ISSUE 14)	GT&C 29.1, 29.2, 29.3	Unresolved.
Force Majeure (ISSUE 15)	GT&C 33.1	<i>The parties have resolved this issue.</i>
Scope of Agreement (ISSUE 16)	GT&C 43.1	<i>The parties have resolved this issue.</i>
Access to CLEC Network Elements (ISSUE 17)	GT&C 45.7.11	<i>The parties have resolved this issue.</i>
Combinations of Unbundled Network Elements Generally (ISSUE 18)	App. UNE 1.1, 2.9.8	Unresolved.
Enhanced Extended Loops (ISSUE 19)	App. UNE all of 9.0 (new), 14.1	Unresolved.
Local Loop Definition (ISSUE 20)	App. UNE 7.1, 7.2.5; GT&C 1.6.6 & 1.7.7	Resolved for the most part; remaining question is whether Ameritech should be required to provide notice of the availability of higher capacity loops.

**Level 3 and Ameritech
JOINT UNRESOLVED ISSUES LIST – ILLINOIS
Docket No. 00-0332**

Subloops (ISSUE 21)	App. UNE Sections 8.1 to 8.10 (new)	<i>The parties have resolved this issue.</i>
Dedicated Transport (ISSUE 22)	App. UNE 9.1, 9.3.1, 9.3.2, 9.3.2.1, 9.3.3.1	Resolved for the most part; remaining questions are: (i) whether Level 3 should be permitted to request transport from an Ameritech central office to a third party carrier's location where Level 3 maintains a presence; and (ii) whether Ameritech should be required to provide notice of the availability of higher capacity facilities.
Payload Mapping (ISSUE 23)	App. UNE 9.3.2	Unresolved.
Dark Fiber (ISSUE 24)	App. UNE Section 9.4 (new), 17.4.1, 17.5.1, 17.6.1, 17.6.2, 17.6.3, 17.7.2	Resolved in part, with the parties continuing to discuss the few remaining issues.
Diversity (ISSUE 25)	App. UNE 9.4.2	Unresolved.
Cross Connects (ISSUE 26)	App. UNE 13.3, 13.4, 13.4 (new), 13.6 (new)	Unresolved, except that the Parties agree that Ameritech may, but is not required to, provide cross connects between the collocation spaces of two CLECs collocated in the same Ameritech serving wire center.
Point of Interconnection (ISSUE 27)	App. Network Interconnection Methods (NIM) 1.9, 2.1, 2.2, 2.4, 2.6, 2.8, 3.4.1, 4.1; App. ITR 5.2, 5.2.1, 5.2.3, 5.2.7, 5.3.2.1	Unresolved.
Optical Interconnection (ISSUE 28)	App. NIM 2.9.2	<i>The parties have resolved this issue.</i>
Transit Traffic (ISSUE 29)	GT&C 38.1; App. ITR 4.2.1, 4.3; App. Recip. Comp. 6.2.	Unresolved.

**Level 3 and Ameritech
JOINT UNRESOLVED ISSUES LIST – ILLINOIS
Docket No. 00-0332**

End Office Trunking (ISSUE 30)	App. ITR 4.4, 5.2.1, 5.3.3.1, 6.6	Unresolved.
Forecasting (ISSUE 31)	App. ITR 6.1, 6.2, 6.2.1, 6.2.2, 6.2.3, 6.3, 6.6	Unresolved.
Trunk Blocking (ISSUE 32)	App. ITR 7.1	Unresolved.
Trunk Utilization (ISSUE 33)	App. ITR 8.4.1, 8.4.1.1	Unresolved.
Indemnity (ISSUE 34)	App. OSS Resale & UNE 3.2.1, 3.2.2, 3.4, 3.11	Unresolved.
Significant Degradation of Services Caused by Deployment of Advanced Services (ISSUE 35)	App. DSL 13.6.4, 14.9.2.3; GT&C 1.1.97 (new), 1.1.68 (new)	<i>The parties have resolved this issue.</i>
Intervals for Adjacent Structure Collocation (ISSUE 36)	App. Collocation 3.7.5	<i>The parties have resolved this issue.</i>
Continuation of Services (ISSUE 37)	GT&C 2.13	<i>The parties have resolved this issue.</i>

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on July 12, 2000, he has caused copies of the attached Joint Unresolved Issues List for Docket 00-0332 to be served on each of the persons listed below electronically and/or via overnight mail:

Nancy H. Wittebort
Ameritech Illinois
225 W. Randolph, Suite 27C
Chicago, IL 60606
(312) 727-4517 (fax)
nancy.h.wittebort@ameritech.com

G. Darryl Reed
Staff Counsel
Telecommunications Division
Illinois Commerce Commission
527 East Capital Avenue
Springfield, IL 62701
(312) 793-1556 (fax)
Dreed@icc.state.il.us

Sherwin Zaban, Hearing Examiner
Eve Moran
Nora Naughton
Illinois Commerce Commission
160 North LaSalle Street, C-800
Chicago, IL 60601
(312) 793-1556 (fax)
Szaban@icc.state.il.us
Emoran@icc.state.il.us
Nnaughto@icc.state.il.us

Dennis G. Friedman
Christian F. Binnig
Mayer, Brown & Platt
190 South LaSalle Street
Chicago, IL 60603
(312) 782-0600 (fax)
dfriedman@mayerbrown.com
cbinnig@mayerbrown.com

Torsten Clausen
A. Olusanjo Omoniyi
Julia Vanderlaan
Telecommunications Division
Illinois Commerce Commission
527 East Capital Avenue
Springfield, IL 62701
Jvanderl@icc.state.il.us

Edward W. Kirsch